

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BOARD OF TRUSTEES OF THE AFTRA
RETIREMENT FUND, in its capacity as a
fiduciary of the AFTRA Retirement Fund,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

No. 09-cv-00686 (SAS) (DF)

BOARD OF TRUSTEES OF THE IMPERIAL
COUNTY EMPLOYEES' RETIREMENT
SYSTEM, in its capacity as a fiduciary of the
Imperial County Employees' Retirement System,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

No. 09-cv-03020 (SAS) (DF)

THE INVESTMENT COMMITTEE OF THE
MANHATTAN AND BRONX SURFACE
TRANSIT OPERATING AUTHORITY
PENSION PLAN, in its capacity as a fiduciary
of the MaBSTOA Pension Plan, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

No. 09-cv-04408 (SAS) (DF)

DECLARATION OF SAMUEL E. BONDEROFF

SAMUEL E. BONDEROFF declares under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an associate with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys for defendant JPMorgan Chase Bank, N.A. in this action. I respectfully submit this declaration on behalf of defendant in support of its Reply Memorandum of Law in further support of its motion *in limine* to exclude certain expert testimony of Bernard Black, Fiachra O'Driscoll, and Daniel Nigro.

2. The purpose of this declaration is to submit and identify for the Court true and correct copies of the following testimony and documents referenced in defendant's moving papers.

3. Attached as Exhibit H is a true and correct copy of excerpts of the deposition transcript of Daniel J. Nigro dated November 18, 2010.

4. Attached as Exhibit I is a true and correct copy of deposition exhibit 22 from the deposition of Lisa Shin dated June 25, 2010.

5. Attached as Exhibit J is a true and correct copy of deposition exhibit 2 from the deposition of Lisa Shin dated June 25, 2010.

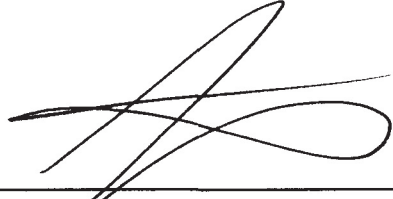
6. Attached as Exhibit K is a true and correct copy of deposition exhibit 17 from the deposition of James Wilson dated June 29, 2010.

7. Attached as Exhibit L is a true and correct copy of excerpts of the deposition transcript of James Wilson dated June 29, 2010.

8. Attached as Exhibit M is a true and correct copy of excerpts of the deposition transcript of John Richard dated December 8, 2010.

9. Attached as Exhibit N is a true and correct copy of excerpts of the Expert Report of Andrew Metrick dated September 30, 2010.

Dated: New York, New York
October 25, 2011



SAMUEL E. BONDEROFF